

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF MISSISSIPPI**

J.W., a minor, by and through Amanda Williams, Guardian and Next Friend, et. al.  Plaintiff,  v.  The City of Jackson, Mississippi; Chowke A. Lumumba Jr.; Tony Yarber; Kishia Powell; Robert Miller; Jarriot Smash; The Mississippi State Department of Health; Jim Craig; Trilogy Engineering Services LLC; and John Does 1-40; et al.,  Defendants.	Case No.: 3:21-cv-00663-CWR-LGI  Hon. Carlton W. Reeves
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**UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE ANSWER  
OR OTHER RESPONSIVE PLEADING**

**COMES NOW**, Defendant, Trilogy Engineering Services LLC (“Trilogy” or “Defendant”), through counsel of record, and respectfully requests the Court to extend Defendant’s deadline to respond to the Plaintiff’s Complaint and Jury Trial Demand, and in support thereof, Defendant states:

1. Plaintiff, J.W., a Minor, by and through Amanda Williams, as Guardian and Next Friend (herein “Plaintiff”), filed a Complaint with Jury Demand (the “Complaint”) on October 19, 2021. [ECF Doc. 1].

2. Plaintiff has indicated her intent to submit a motion requesting leave to file an Amended Complaint in this matter, which Trilogy does not intend to oppose. Plaintiff has agreed that the decision not to oppose this amendment will not constitute a waiver of any defense to Plaintiff’s future averments and claims. Plaintiff has also agreed that Trilogy need not file a response to the Complaint given Plaintiff’s intent to file an Amended Complaint.

3. Trilogy's responsive pleading to the Complaint is not yet due, as the Court previously extended Trilogy's time to respond until January 12, 2022. [ECF Text Order, 12/8/21].

4. Plaintiff will file an Amended Complaint on or before February 15, 2021.

5. It is agreed that upon Plaintiff's filing the Amended Complaint, Trilogy will have twenty-one (21) days to answer or otherwise respond to same.

6. Should the Court disallow Plaintiff's Amended Complaint, Trilogy requests a second extension, of twenty-one (21) days from such ruling, in which to file its responsive pleading to the Complaint.

7. The undersigned has conferred with counsel for the Plaintiff who has no objection to the relief sought.

8. The relief sought will not delay the administration of this matter. Further, this request is being made for good cause and is not made for the purpose of delay or harassment.

WHEREFORE, Defendant, Trilogy Engineering Services LLC, respectfully requests that this Court enter an order that it need not respond to Plaintiff's Complaint. Alternatively, should this Court disallow the Amended Complaint, that Trilogy be afforded twenty-one (21) days from such ruling in which to file its responsive pleading to the Complaint.

This, the 12th day of January, 2022.

Respectfully submitted,

By: /s/ Richard G. Daniels  
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**CERTIFICATE OF SERVICE**

The undersigned certifies that on January 12, 2022, I electronically filed an Appearance with the Clerk of the Court using ECF system which will send notification of such filing to all attorneys of record.

Respectfully submitted,

By: /s/ Richard G. Daniels  
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